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*Representing the United States of America*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CARLOS RECINOS-VALDEZ,

and

KEVIN RECINOS-RUANO,

Defendants.

Case No: 3:25-cr-10-MMD-CLB

**CRIMINAL INDICTMENT**

Title 8 U.S.C. § 1324(a)(1)(A)(v)(I) and  
(a)(1)(B)(i)—Conspiracy to Harbor Illegal  
Aliens (Counts One and Two)

Title 8 U.S.C. §§ 1324 (a)(1)(A)(iii) and  
(a)(1)(B)(i)—Harboring Illegal Aliens  
(Counts Three, Four, and Five)

Title 18 U.S.C. §§ 1951 and 2— Aiding  
and Abetting Attempted Interference with  
Commerce by Extortion (Counts Six and  
Eight)

Title 8 U.S.C. §§ 1324(a)(2) and  
(a)(2)(B)(ii) and Title 18 U.S.C. § 2—  
Aiding and Abetting Bringing Illegal  
Aliens (Count Seven)

THE GRAND JURY CHARGES THAT:

**COUNT ONE**

Conspiracy to Harbor Illegal Aliens  
(8 U.S.C. §§ 1324 (a)(1)(A)(v)(I) and (a)(1)(B)(i))

Beginning on a date unknown but not earlier than July 2021, continuing up to and  
including on or about March 11, 2025, in the State and Federal District of Nevada,

1 and elsewhere,

2 CARLOS RECINOS-VALDEZ,

3 defendant herein, combined, conspired, confederated, agreed, and acted interdependently  
4 with other persons whose names are known and unknown to the Grand Jury to commit an  
5 offense defined in 8 U.S.C. §§ 1324(a)(1)(A)(iii) and (a)(1)(B)(i), specifically, harboring  
6 illegal aliens, for the purpose of commercial advantage and private financial gain; all in  
7 violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and (a)(1)(B)(i).

8 COUNT TWO

9 Conspiracy to Harbor Illegal Aliens  
(8 U.S.C. §§ 1324 (a)(1)(A)(v)(I) and (a)(1)(B)(i))

10 Beginning on a date unknown but not earlier than March 13, 2023, continuing up to  
11 and including on or about March 11, 2025, in the State and Federal District of Nevada,  
12 and elsewhere,

13 KEVIN RECINOS-RUANO,

14 defendant herein, combined, conspired, confederated, agreed, and acted interdependently  
15 with other persons whose names are known and unknown to the Grand Jury to commit an  
16 offense defined in 8 U.S.C. §§ 1324(a)(1)(A)(iii) and (a)(1)(B)(i), specifically, harboring  
17 illegal aliens, for the purpose of commercial advantage and private financial gain; all in  
18 violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I) and (a)(1)(B)(i).

19 COUNT THREE

20 Harboring Illegal Aliens  
(8 U.S.C. §§ 1324 (a)(1)(A)(iii) and (a)(1)(B)(i))

21 Beginning on or about July 2021, continuing up to and including on or about March  
22 11, 2025, in the State and Federal District of Nevada,

23 CARLOS RECINOS-VALDEZ,

24 defendant herein, knowing and in reckless disregard of the fact that an alien, namely, A.R.,

1 had come to, entered and remained in the United States in violation of law, did conceal,  
2 harbor, and shield from detection such alien in buildings and other places for the purpose  
3 of commercial advantage and private financial gain; all in violation of Title 8, United States  
4 Code, Sections 1324(a)(1)(A)(iii) and (a)(1)(B)(i).

5 COUNT FOUR  
6 Harboring Illegal Aliens  
(8 U.S.C. §§ 1324 (a)(1)(A)(iii) and (a)(1)(B)(i))

7 Beginning on or about June 2024, continuing up to and including on or about  
8 March 11, 2025, in the State and Federal District of Nevada,

9 CARLOS RECINOS-VALDEZ,  
10 defendant herein, knowing and in reckless disregard of the fact that an alien, namely, E.G.,  
11 had come to, entered and remained in the United States in violation of law, did conceal,  
12 harbor, and shield from detection such alien in buildings and other places for the purpose  
13 of commercial advantage and private financial gain; all in violation of Title 8, United States  
14 Code, Sections 1324(a)(1)(A)(iii) and (a)(1)(B)(i).

15 COUNT FIVE  
16 Harboring Illegal Aliens  
(8 U.S.C. §§ 1324 (a)(1)(A)(iii) and (a)(1)(B)(i))

17 Beginning on a date not earlier than February 1, 2024, continuing up to and  
18 including on or about March 11, 2025, in the State and Federal District of Nevada,

19 CARLOS RECINOS-VALDEZ,  
20 defendant herein, knowing and in reckless disregard of the fact that an alien, namely,  
21 G.J.S., had come to, entered and remained in the United States in violation of law, did  
22 conceal, harbor, and shield from detection such alien in buildings and other places for the  
23 purpose of commercial advantage and private financial gain; all in violation of Title 8,  
24 United States Code, Sections 1324(a)(1)(A)(iii) and (a)(1)(B)(i).

COUNT SIX

Aiding and Abetting Attempted Interference with Commerce by Extortion  
(18 U.S.C. §§ 1951 and 2)

On or about February 2, 2025, in the State and Federal District of Nevada,

CARLOS RECINOS-VALDEZ,

defendant herein, aiding and abetting other unknown to the Grand Jury, unlawfully attempted to obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by extortion as that term is defined in Title 18, United States Code, Section 1951(b)(2), in that the defendant did unlawfully attempt to obtain United States currency, from A.R., by means of actual and threatened force, violence, and fear of injury to the person of A.R.; all in violation of Title 18, United States Code, Sections 1951(a) and 2.

COUNT SEVEN

Aiding and Abetting Bringing Illegal Aliens  
(8 U.S.C. §§ 1324 (a)(2) and (a)(2)(B)(ii), 18 U.S.C. § 2)

Beginning on a date unknown but not earlier than November 1, 2024, continuing up to and including on or about March 11, 2025, in the State and Federal District of Nevada, and elsewhere,

CARLOS RECINOS-VALDEZ,

defendant herein, aiding and abetting others known and unknown to the Grand Jury, knowing and in reckless disregard of the fact that an alien, namely, D.O.M.A, had not received prior official authorization to come to, enter and reside in the United States, did bring to the United States said alien, for the purpose of commercial advantage and private financial gain; all in violation of Title 8, United States Code, Sections 1324(a)(2), (a)(2)(B)(ii), and Title 18, United States Code, Section 2.

COUNT EIGHT

Aiding and Abetting Attempted Interference with Commerce by Extortion  
(18 U.S.C. §§ 1951 and 2)

From a time unknown but not earlier than on or about February 11, 2025, and continuing up to and including on or about March 11, 2025, in the State and Federal District of Nevada,

CARLOS RECINOS-VALDEZ,  
defendant herein, aiding and abetting others unknown to the Grand Jury, unlawfully attempted to obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951(b)(3), and the movement of articles and commodities in such commerce, by extortion as that term is defined in Title 18, United States Code, Section 1951(b)(2), in that the defendant did unlawfully attempt to obtain United States currency, from G.J.S., by means of actual and threatened force, violence, and fear of injury to the person of D.O.M.A.; all in violation of Title 18, United States Code, Sections 1951(a) and 2.

**DATED:** this 3<sup>rd</sup> day of April, 2025.

**A TRUE BILL:**

/s/  
FOREPERSON OF THE GRAND JURY

SIGAL CHATTAH  
United States Attorney

  
ANDREW KEENAN  
Assistant United States Attorney